IN THE UNITED STATES BANKRUPTCY COURT FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: : CHAPTER 11

UPTOWN PARTNERS, LP, :

DEBTOR, : CASE NO. 1:23-BK-00988-HWV

THE CITY OF HARRISBURG, :

MOVANT, : RELATED TO DOC. NOS. 163 AND 171

JOINT MOTION TO CONTINUE HEARINGS ON DEBTOR'S MOTION FOR A 2004 EXAM OF THE CITY OF HARRISBURG AND THE CITY OF HARRISBURG'S MOTION TO DISMISS DEBTOR'S CASE

Debtor and Movant, by and through their undersigned attorneys, hereby jointly move for continuance of the scheduled hearings in this matter, and in support thereof, state:

- 1. A hearing is scheduled for August 27, 2024 at 9:30 AM to adjudicate the Debtor's Motion for a 2004 Exam of the City of Harrisburg (the "2004 Exam").
- 2. The parties agree that testimony is necessary for the Court to adjudicate the 2004 Exam and the current hearing should be rescheduled for October 10, 2024 at 9:30 AM to allow sufficient time for testimony.
- 3. A hearing is scheduled for September 17, 2024 at 9:30 AM on the City of Harrisburg's Motin to Dismiss the Debtor's bankruptcy case (the "Motion to Dismiss")
- 4. The parties agree that testimony is necessary for the Court to adjudicate the Motion to Dismiss and the hearing should be rescheduled for October 24, 2024 at 9:30 AM to allow sufficient time for testimony.
- 5. Postponement of these hearings will not prejudice any party and is in the interest of justice and judicial economy.

WHEREFORE, for the reasons stated herein, the parties respectfully jointly request that this Joint Motion to Continue Hearings be GRANTED along with such other relief that is just and proper.

Respectfully submitted,

By: /s/Clayton W. Davidson

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By: <u>/s/Robert E. Chernicoff</u>

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Date: August 21, 2024